



CHEMTRADE

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BAY AREA AIR QUALITY
MANAGEMENT DISTRICT

January 26, 2018

Mr. Kelly Wee
Director of Compliance and Enforcement
Attention: Title V Reports
Bay Area Air Quality Management District
375 Beale Street #600
San Francisco, CA 94105

Re: Chemtrade West US LLC – Richmond, Facility #A0023

Title V Semiannual Report – Q1/Q2 2017

Dear Mr. Wee:

Please find enclosed the corrected semiannual monitoring report for Chemtrade West US LLC – Richmond for the reporting period of January 1, 2017 – June 30, 2017.

While completing the semi-annual report for July 01, 2017 to December 31, 2017 we noticed that we had incorrectly labeled the months as July – December instead of January – June. We have corrected this error and we are submitting a new report with the correct months. Everything else on the report remains the same.

There were no instances of non-compliance during this reporting period.

Attached are semi-annual throughputs and SO2 reports for this reporting period.

If you should have any questions, please contact Ana Dias, process engineer, at (510) 232-7193 x244.

Sincerely yours,

Mike Shepherd
Plant Manager
Chemtrade West US LLC – Richmond

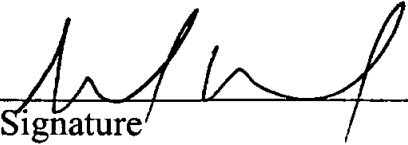
cc: Director of the Air Division
USEPA, Region IX
Attention: Air - 3
75 Hawthorne Street
San Francisco, CA 94105

CHEMTRADE WEST US LLC
525 CASTRO ST. RICHMOND, CA 94801
WEB SITE: WWW.CHEMTRADELOGISTICS.COM
Page 1 of 2

Compliance Certification

Based on information and belief formed after reasonable inquiry, the statements and information in the attached Data Update form are true, accurate, and complete.

Mike Shepherd
Name of Responsible Official


Signature

Certification Period: January 1, 2017 through June 30, 2017

01/26/2018
Date

Facility A0023
Chemtrade West, US LLC
525 Castro Street
Richmond, CA
94801

Chemtrade West US LLC
Richmond Works- Facility #A0023
Title V - Semi Annual Monitoring Report
Period: 01/01/17 - 06/30/17

Source	Pollutant	Emission Limit Citation	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Results
S-1 Sulfuric Acid Mfg.	SO ₂	SIP 9-1-308.2	Gaseous emissions from any source at an H ₂ SO ₄ plant shall not exceed 300 ppmv @ 12% O ₂	SIP 9-1-502	C	CEM	01/01/17 - 06/30/17 Submitted monthly via CEM reports.
	SO ₂	BAAQMD Regulation 9-1-309	Gaseous emissions from any source at an H ₂ SO ₄ plant shall not exceed 300 ppmv @ 12% O ₂	SIP 9-1-502	C	CEM	01/01/17 - 06/30/17 Submitted monthly via CEM reports.
	Acid Mist	BAAQMD Regulation 12-6-301	Gaseous emissions from any source at an H ₂ SO ₄ plant shall not exceed 0.15 g/kg (0.3 lb/ton) of acid produced	BAAQMD Condition # 14980	P/A	Source Test	Source test performed on June 15, 2017. Results were submitted to Source Test and Enforcement Division.
S-9 Process Air Heater	NOx, CO, VOC, PM10	BAAQMD Condition# 7934 Part 2	Fuel consumption shall not exceed 61.3 million cubic feet / 12 month period	BAAQMD Condition# 7934 Part 3	P/M	Monthly Records	Jan 3,275 mscf Feb 3,293 mscf Mar 3,672 mscf Abr 3,389 mscf May 3,563 mscf Jun 3,222 mscf
S-15 Startup Air Heater	NOx, CO, VOC, PM10	BAAQMD Condition# 7606 Part 2	Fuel consumption shall not exceed 5,000,000 cubic feet / 12 month period	BAAQMD Condition# 7606 Part 2	P/M	Monthly Records	Jan 1,56,419 scf Feb 61,889 scf Mar 100,610 scf Abr 1,298,869 scf May 0 scf Jun 24,874 scf

Chemtrade West US LLC
Richmond Works- Facility #A0023
Title V - Semi Annual Monitoring Report
Period: 01/01/17 - 06/30/17

Source		Regulated Pollutant	Condition	Limit	Monitoring Method	Frequency	Monitoring Location	Monitoring Period	Monitoring Results
S-16 Alkylation Storage Tank # 13	VOC, PM10	BAAQMD Condition# 13215 Part 1	Throughput shall not exceed 146,000 ton / 12 month period	BAAQMD Condition# 13215 Part 1	P/M	Monthly Records	Jan Feb Mar Abr May Jun	0 0 0 0 0 0 tons tons tons tons tons tons	
	SO ₂	SIP 9-1-308.2	Gaseous emissions from any source at an H ₂ SO ₄ plant shall not exceed 300 ppmv @ 12% O ₂	SIP 9-1-502	C	CEM	01/01/17 - 6/30/17 Submitted monthly via CEM reports.		
	SO ₂	BAAQMD Regulation 9-1- 309	Gaseous emissions from any source at an H ₂ SO ₄ plant shall not exceed 300 ppmv @ 12% O ₂	SIP 9-1-502	C	CEM	01/01/17 - 06/30/17 Submitted monthly via CEM reports.		
S-24 Elec. Grade Sulfuric Acid Mfg.		BAAQMD Condition# 13507 Part 1	Production shall not exceed 15,000 ton / 12 month period	BAAQMD Condition# 13507 Part 3	P/M	Monthly Records	Jan Feb Mar Abr May Jun	420 512 349 431 702 652 tons tons tons tons tons tons	
S-32 Alkylation Storage Tank # 14	VOC, PM10	BAAQMD Condition# 13889 Part 2	Throughput shall not exceed 219,000 ton / 12 month period	BAAQMD Condition # 13889 Part 3	P/M	Monthly Records	Jan Feb Mar Abr May Jun	0 0 0 0 0 0 tons tons tons tons tons tons	



CHEMTRADE

January 18, 2018

Mr. Kelly Wee
Director of Compliance and Enforcement
Attention: Title V Reports
Bay Area Air Quality Management District
375 Beale Street #600
San Francisco, CA 94105

Re: Chemtrade West US LLC – Richmond, Facility #A0023

Title V Semiannual Report – Q3/Q4 2017

Dear Mr. Wee:

Please find enclosed the semiannual monitoring report for Chemtrade West US LLC – Richmond for the reporting period of July 1, 2017 – December 31, 2017.

There were no instances of non-compliance during this reporting period.

Attached are semi-annual throughputs and SO2 reports for this reporting period.

If you should have any questions, please contact Ana Dias, process engineer, at (510) 232-7193 x244.

Sincerely yours,

Mike Shepherd
Plant Manager
Chemtrade West US LLC – Richmond

cc: Director of the Air Division
USEPA, Region IX
Attention: Air - 3
75 Hawthorne Street
San Francisco, CA 94105


CHEMTRADE WEST US LLC
525 CASTRO ST. RICHMOND, CA 94801
WEB SITE: WWW.CHEMTRADELOGISTICS.COM

Page 1 of 2

Compliance Certification

Based on information and belief formed after reasonable inquiry, the statements and information in the attached Data Update form are true, accurate, and complete.

Mike Shepherd
Name of Responsible Official


Signature

Certification Period: July 1, 2017 through December 31, 2017

1/18/2018
Date

Facility A0023
Chemtrade West, US LLC
525 Castro Street
Richmond, CA
94801

Chemtrade West US LLC
Richmond Works- Facility #A0023
Title V - Semi Annual Monitoring Report
Period: 07/01/2017 - 12/31/17

Source	Pollutant	Emission Limit Citation	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Results
S-1 Sulfuric Acid Mfg.	SO ₂	SIP 9-1-308.2	Gaseous emissions from any source at an H ₂ SO ₄ plant shall not exceed 300 ppmv @ 12% O ₂	SIP 9-1-502	C	CEM	07/01/17 - 12/31/17 Submitted monthly via CEM reports.
	SO ₂	BAAQMD Regulation 9-1-309	Gaseous emissions from any source at an H ₂ SO ₄ plant shall not exceed 300 ppmv @ 12% O ₂	SIP 9-1-502	C	CEM	07/01/17 - 12/31/17 Submitted monthly via CEM reports.
	Acid Mist	BAAQMD Regulation 12-6-301	Gaseous emissions from any source at an H ₂ SO ₄ plant shall not exceed 0.15 g/Kg (0.3 lb/ton) of acid produced	BAAQMD Condition # 14980	P/A	Source Test	Source test performed on June 15, 2017. Results were submitted to Source Test and Enforcement Division.
S-9 Process Air Heater	NO _x , CO, VOC, PM10	BAAQMD Condition# 7934 Part 2	Fuel consumption shall not exceed 61.3 million cubic feet / 12 month period	BAAQMD Condition# 7934 Part 3	P/M	Monthly Records	Jul 2,600 mscf Aug 3,211 mscf Sept 3,031 mscf Oct 3,146 mscf Nov 3,074 mscf Dec 3,522 mscf
S-15 Startup Air Heater	NO _x , CO, VOC, PM10	BAAQMD Condition# 7606 Part 2	Fuel consumption shall not exceed 5,000,000 cubic feet / 12 month period	BAAQMD Condition# 7606 Part 2	P/M	Monthly Records	Jul 54,489 scf Aug 52,593 scf Sept 69,776 scf Oct 47,008 scf Nov 23,941 scf Dec 24,938 scf

Chemtrade West US LLC
Richmond Works- Facility #A0023
Title V - Semi Annual Monitoring Report
Period: 07/01/2017 - 12/31/17

Semi-Annual Period		Emissions		Throughput		Air Quality		Monitoring		Reporting	
Unit	Period	Condition	Condition	Condition	Condition	Condition	Condition	Condition	Condition	Condition	Condition
S-16 Alkylation Storage Tank # 13	VOC, PM10	BAAQMD Condition# 13215 Part 1	Throughput shall not exceed 146,000 ton / 12 month period	BAAQMD Condition# 13215 Part 1	P/M	Monthly Records	Jul 0 tons Aug 0 tons Sept 0 tons Oct 0 tons Nov 0 tons Dec 0 tons	07/01/17 - 12/31/17 Submitted monthly via CEM reports.			
	SO ₂	SIP 9-1-308.2	Gaseous emissions from any source at an H ₂ SO ₄ plant shall not exceed 300 ppmv @ 12% O ₂	SIP 9-1-502	C	CEM	07/01/17 - 12/31/17 Submitted monthly via CEM reports.				
S-24 Elec. Grade Sulfuric Acid Mfg.	SO ₂	BAAQMD Regulation 9-1- 309	Gaseous emissions from any source at an H ₂ SO ₄ plant shall not exceed 300 ppmv @ 12% O ₂	SIP 9-1-502	C	CEM	Jul 533 tons Aug 1068 tons Sept 847 tons Oct 703 tons Nov 867 tons Dec 901 tons	07/01/17 - 12/31/17 Submitted monthly via CEM reports.			
		BAAQMD Condition# 13507 Part 1	Production shall not exceed 15,000 ton / 12 month period	BAAQMD Condition# 13507 Part 3	P/M	Monthly Records					
S-32 Alkylation Storage Tank # 14	VOC, PM10	BAAQMD Condition# 13889 Part 2	Throughput shall not exceed 219,000 ton / 12 month period	BAAQMD Condition # 13889 Part 3	P/M	Monthly Records	Jul 0 tons Aug 0 tons Sept 0 tons Oct 0 tons Nov 0 tons Dec 0 tons	07/01/17 - 12/31/17 Submitted monthly via CEM reports.			